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March 10, 2009

VIA HAND DELIVERY

Vickie Nardello, Co-Chair
Energy and Technology Committee
Room 3900, Legislative Office Building
Hartford, CT 06106

RE: New England Power Generators Association, Inc.'s comments on Raised Bill No. 6636: An Act Concerning The Connecticut Clean Energy Fund.

Dear Chairwoman Nardello:

In anticipation of the public hearing scheduled today on the above referenced bill, the New England Power Generators Association, Inc. ("NEPGA") hereby respectfully files the following comments relating to the contract procurement process of the Connecticut Clean Energy Fund (CCEF) Project 150.¹ NEPGA is the largest trade association representing competitive electric generating companies in New England. NEPGA's member companies represent over 26,000 megawatts of generating capacity throughout New England, and over 7,300 megawatts of generating capacity in Connecticut, representing the vast majority of electric generating capacity in Connecticut. NEPGA's mission is to promote sound energy policies which will further economic development, jobs, and balanced environmental policy.

NEPGA specifically opposes the provisions in HB 6636 that revise the competitively procured contracts that were awarded to renewable energy projects by the DPUC as part of Project 150. This legislation unfairly allows companies that were awarded contracts through a competitive process based on price to modify those contracts outside of the established process. NEPGA maintains that the best way to achieve the statutory objectives of the CCEF is with a strict adherence to uniform criteria that consistently treats all project proponents as competitive market participants. Furthermore, the criteria should establish a clear and deliberate, formulaic approach to selecting the most economical projects that will reduce overall electricity rates for consumers while increasing the amount of renewable energy available to Connecticut.

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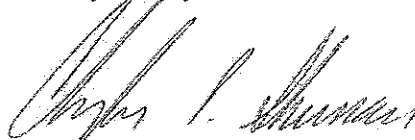
The views expressed in these comments do not necessarily represent the positions of each of NEPGA's members. In addition, nothing in these comments should be deemed to waive any rights that NEPGA or any of its members may have to challenge the administrative, procedural or substantive validity of the proposed legislation in any forum.

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However, the ultimate affect of HB 6636 would be to undermine confidence and discourage future participation by renewable energy providers in CCEF solicitations, thereby not providing renewable energy in Connecticut, in contravention to the extensive efforts of the legislature and CCEF. Ultimately, less renewable energy in Connecticut only serves to increase the cost of RPS compliance for consumers and further endangers the likelihood of success of valuable renewable initiatives. NEPGA is confident that future CCEF solicitations can incent private investment in renewable energy; however, these infrastructure enhancements are contingent upon a business climate that guarantees sound and prudent investments through a stable, consistent regulatory and legislative environment. Consistent and competitive regulatory signals are the most appropriate mechanism to ensure the most reasonable costs for obtaining these renewable resources.

Thank you for consideration of these comments. If you have any questions, please don't hesitate to contact me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Chris P. Sherman", is written over a horizontal line.

Christopher P. Sherman
General Counsel